

Clerk, U.S. District Court
Southern District of Texas
FILED

SEP 29 2014

A091 (Rev. 8/01) Criminal Complaint

David J. Bradley, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

V.

Santos Orlando FLORES**CRIMINAL COMPLAINT**

Case Number:

04-1030M

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 9/28/2014 in Kenedy County, in the

(Date)

Southern District of Texas defendant, **Santos Orlando FLORES**

a native and citizen of El Salvador, and an alien who had been previously removed from the United States after having been convicted of a felony was found unlawfully within the United States in Kenedy County, Texas, the said defendant having not obtained the consent of the Attorney General or the Secretary of the Department of Homeland Security for application for readmission into the United States,

in violation of Title 8 United States Code, Section(s) 1326.

I further state that I am a(n) Special Agent and that this complaint is based on the

Official Title

following facts:

On September 28, 2014, at approximately 11:30 hours, U.S. Border Patrol (USBP) Supervisory Agent Shane Urban encountered an individual walking on the side of a highway in Kenedy County, TX. The individual, later identified as Santos Orlando FLORES admitted he was a citizen of El Salvador and was unlawfully present in the U.S. Record checks conducted by USBP revealed on November 29, 2011, FLORES was convicted of counterfeiting and fraud and was subsequently sentenced to 2 years imprisonment. On August 9, 2012, FLORES was administratively ordered removed from the U.S. On August 24, 2012, FLORES was removed to El Salvador via the Miami, Florida, port of entry (POE). At this time no evidence has been discovered suggesting FLORES requested permission from the Attorney General or the Secretary of the Department of Homeland Security to enter the United States. AUSA Patty Booth was notified and agreed to prosecute FLORES for violation of Title 8 USC 1326.

Signature of Complainant

Eric Martinez

Printed Name of Complainant

Sworn to before me and signed in my presence,

September 29, 2014

Date

Jason Libby, U.S. Magistrate Judge

Name and Title of Judicial Officer

at

Corpus Christi, Texas

City and State

Signature of Judicial Officer